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Federal Communications Commission  
FCC Headquarters  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554  
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Dear Federal Communications Commission:

I am writing to provide public comment on the public notice seeking comment on the applications filed for the transfer of control of the subsidiaries of General Communications, Inc. to GCI Liberty, Inc. (WC Docket No. 17-114).

In their consolidated application for consent to transfer of control of international and domestic section 214 authority, General Communication, Inc. and GCI Liberty, Inc. state that, consistent with the public interest, they are committed to continued investment in Alaska. The applicants also stated their commitment to "expanding wireline and mobile wireless broadband service in Alaska through [their] Alaska Plan commitments, which are binding obligations to expand the availability of modern broadband services, both fixed and mobile, to remote areas of Alaska."<sup>1</sup> While I am encouraged by the prospect that this acquisition will strengthen the applicant's efforts to provide broadband internet access to Alaskans throughout the state, I believe that the current framework of the Alaska Plan does not do nearly enough to serve the public interest of expanding access to reliable, reasonably priced broadband services.

While access to broadband internet services is a significant concern, I would also like to take this opportunity to bring the continued absence of mobile cellular service in many Alaskan communities to the attention of the Commission. As the Commission adopted comprehensive reforms to universal service in 2011, with its USF/ICC Transformation Order, it "expressed particular concern that "[o]ver 50 communities in Alaska have no access to mobile voice service

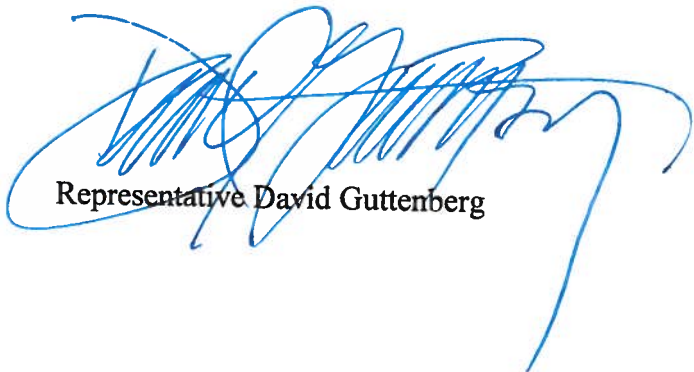
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<sup>1</sup> WC Docket No. 17-114, page 3, para. 2.

today, and many remote Alaskan communities have access to only 2G services.”<sup>2</sup> In spite of the Alaska Plan’s “creation of a separate fund that will reallocate a majority of the annual funding currently dedicated to mobile providers in non-remote areas of Alaska and create a reverse auction to expand service in unserved areas of remote Alaska,”<sup>3</sup> there are still many remote communities who have no access to mobile cellular service. These circumstances are also in spite of the fact that often times, providers in these communities have received and utilized universal service funds to develop broadband access for medical clinics and schools, creating the backhaul necessary to deploy mobile cellular service. I have spoken to providers who have created microwave infrastructure to deliver broadband access to these facilities, but who do not have the capacity to deliver mobile cellular service. They have expressed their willingness to collaborate with other vendors, creating arrangements which would allow them to utilize existing bandwidth to provide mobile cellular service, but as a result of the associated costs, have been thus far unsuccessful in developing these relationships. The Commission has observed that carriers in remote Alaska have unique concerns and recognized that Mobility Funds need to be flexible enough to accommodate special conditions in places like Alaska, to account for “its remoteness, lack of roads, challenges and costs associated with transporting fuel, lack of scalability per community, satellite and backhaul availability, extreme weather conditions, challenging topography, and short construction season.”<sup>4</sup> In spite of this recognition, rural Alaskans are going without access to basic cellular service that is taken for granted by the rest of the country.

I would ask that the Commission take this opportunity to review the applicant’s commitments under the Alaska Plan and to consider how these commitments might be revised given the increased capabilities this acquisition would create. I would also ask that the Commission prioritizes its recognition that Mobility Funds must be flexible enough to accommodate the unique conditions of Alaska in order to enable residents of rural Alaska to enjoy the same access to public utilities so often taken for granted by their counterparts around the country.

Respectfully yours,



Representative David Guttenberg

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<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17835, para. 529.

<sup>3</sup> FCC 16-115, Report and Order and Further Notice of Proposed Rulemaking, page 25, para. 72.

<sup>4</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17829, para. 507.